

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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August 26, 2003

T.R.A. DOCKET ROOM

IN RE: IMPLEMENTATION OF THE)
FEDERAL COMMUNICATIONS) Docket No. 03-00460
COMMISSION'S TRIENNIAL REVIEW)
ORDER)

PETITION TO INTERVENE

MCImetro Access Transmission Services, LLC and Brooks Fiber Communications of Tennessee, Inc. (collectively referred to as "MCI") move to intervene, pursuant to T.C.A. § 4-5-310(a), in the above-captioned proceeding.

MCImetro Access Transmission Services, LLC and Brooks Fiber Communications of Tennessee, Inc. are certified, competing local service providers in Tennessee. This proceeding will address, among other things, the terms and conditions under which MCI may operate in Tennessee and, therefore, may determine MCI's legal rights, duties, privileges, immunities, or other loyal interests. Granting this intervention is in the interest of justice and will not impair the orderly and prompt conduct of this proceeding.

At this time, MCI does not intend to participate actively in the initial phase of this proceeding, which will address issues relating to the provision of switching for service to enterprise customers being served using loops at the DS 1 capacity and above, i.e., "the ninety-day phase." Order of August 19, 2003, at 2. See Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC. Docket

No. 01-338 (released August 21, 2003), ¶¶ 451-55. Hence MCI intends only to monitor the ninety-day phase of this proceeding, and thus asks to receive notices, orders and other filings relating to that phase. MCI does, however, reserve the right to participate more fully in the ninety-day phase and to address the issues in that phase if the matter is raised by other parties or by the Authority. Finally, any findings made by the Authority in the ninety-day phase should have no preclusive effect with regard to the issues relating to the nine (9) month proceedings referenced by the Authority. Order of August 19, 2003, at 2..

MCI, therefore, asks that this Petition to Intervene be granted.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

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CERTIFICATE OF SERVICE

This is to certify that I have this day caused to be served by United States mail a copy of the within and foregoing Petition to Intervene upon the following person, properly addressed as follows:

Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

This 28th day of August, 2003.



Jon E. Hastings